



MEMO ENDORSED

VIA ECF

November 28, 2022

Hon. Katharine H. Parker
U.S. District Courthouse
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Bonilla et al. v. Lucero Produce II Corp. & Saul Lucero*
Docket No. 22-CV-153 (PAE) (KHP)

APPLICATION GRANTED: The Case Management Conference scheduled for Tuesday, December 13, 2022 at 11:00 a.m. in Courtroom 17-D, United States Courthouse, 500 Pearl Street, New York, New York is hereby rescheduled to Thursday, February 2, 2023 at 12:35 p.m.

APPLICATION GRANTED

Katharine H. Parker

Hon. Katharine H. Parker, U.S.M.J.

11/28/2022

Dear Judge Parker:

The New York Legal Assistance Group (“NYLAG”) represents Plaintiffs in the above referenced matter. We, together with counsel for Defendants, write jointly to request an adjournment of the December 13, 2022 Case Management Conference pursuant to Your Honor’s approval of the Parties’ previously filed request for an adjournment. See ECF Nos. 34, 33.

Both Parties have previously scheduled matters for December 13, 2022 and missed the opportunity to exclude certain dates in their previous request. The Parties respectfully request the Court to reschedule the Case Management Conference to either December 16, 2022 or December 19, 2022 at whichever time that the Court determines. The Parties make the request in recognition of the deadline of the close of fact discovery of January 13, 2023. See ECF No. 29. The Parties apologize for any inconvenience this request raises and will include or exclude specific dates or times in any future adjournment requests, should they be made.

Thank you for your attention to this matter.

Respectfully submitted,

/s/Brian Nettle

Brian ‘Geno’ Nettle
Staff Attorney, Employment Law Project
New York Legal Assistance Group
Counsel for Plaintiffs

cc: Nicole Brenecki, Esq. (via e-mail and ECF)